



THE CITY OF NEW YORK
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VIA ECF

The Honorable Paul A. Crotty
U.S. District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Residents for Sane Trash Solutions v. U.S. Army Corps of Engineers*, 12-cv-8456
(PAC), and *Kellner v. U.S. Army Corps of Engineers*, 12-cv-8458 (PAC)

Dear Judge Crotty:

I represent the City defendants in the two above-referenced related matters. As you are aware, the parties in these matters have all filed cross-motions for summary judgment, and the City has also filed a motion for partial judgment on the pleadings. Currently, the parties' opposition briefs for these motions are due on December 2, 2013, and reply briefs are due on January 6, 2014.

I write to request an extension of time of the remaining briefing deadlines, which currently fall shortly after the Thanksgiving and New Years holidays, so that the deadlines for all parties' remaining briefs would be as follows: opposition briefs due December 11, 2013; reply briefs due January 15, 2014. This is the City's first request for an extension of the briefing schedule, and the parties in both matters have consented to the City's request.

Thank you for your consideration of this letter.

Respectfully yours,

/s/ Carrie Noteboom
Carrie Noteboom
Assistant Corporation Counsel

cc: All counsel (via ECF)